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### **REMARKS**

This Application has been carefully reviewed in light of the Office Action. Applicants appreciate the Examiner's consideration of the Application. In order to advance prosecution of this Application, Applicants have responded to each notation by the Examiner. Applicants respectfully request reconsideration and favorable action in this case.

# **Drawing Objections**

The Examiner objects to the drawings with respect to Claims 15-16 and 18-20. To advance prosecution, Claims 15-16 and 18-20 have been canceled, rendering the objection moot.

## Section 112 Rejection

The Examiner rejects Claims 15-16 and 18-20 under 35 U.S.C. § 112, first and second paragraphs. To advance prosecution, Claims 15-16 and 18-20 have been canceled, rendering the rejections moot.

The Examiner rejects Claims 1-2, 5-10, 12-16, 18-22, and 24-26 under 35 U.S.C. § 112, second paragraph. To advance prosecution, Claims 1, 9, and 21 have been amended in response to comments made by the Examiner. Claims 1-2, 5-10, 12-14, 21-22, and 24-26 are thus allowable under 35 U.S.C. § 112.

#### Section 103(a) Rejection

The Examiner rejects Claims 1-2, 5-10, 12-16, 18-22, and 24-26 under 35 U.S.C. § 103(a) over U.S. Patent Application Pub. No. 2005/0007969 filed by Hundscheidt et al. ("Hundscheidt"), "Improving Packet Delivery in GPRS/UMTS Networks," by Tsao ("Tsao"), and U.S. Patent Application Pub. No. 2003/0039232 filed by Casati et al. ("Casati"), Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that the combination of *Hundscheidt*, *Tsao*, and *Casati* proposed by the Examiner fails to disclose, teach, or suggest elements specifically recited in Applicants' claims. For example, the *Hundscheidt-Tsao-Casati* combination proposed by the Examiner fails to disclose, teach, or suggest the following recited in amended independent Claim 1:

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a gateway general packet radio service (GPRS) support node (GGSN) operable to:

store the correlation between the APN and the multicast service group in a table within the GGSN.

Casati discloses a multicast server that performs multicasting:

The present invention also provides a mobile telecommunications network comprising a multicast server operative to control the sending, to an access point of the telecommunications network, of a control message to assign a mobile station to a multicast group, and operative to control the sending of a multicast message to the (or each) access point having one or more associated mobile stations assigned to the multicast group.

(Casati, ¶ 0014, lines 1-8.) That is, Casati discloses a multicast server, not a GGSN, that performs multicasting. Presumably, the multicast server, not the GGSN, would store any correlation. Accordingly, Casati fails disclose, teach, or suggest the above element. Hundscheidt and Tsao fail to remedy this deficiency.

Thus, the *Hundscheidt-Tsao-Casati* combination proposed by the Examiner fails to disclose, teach, or suggest the elements of independent Claim 1. For at least these reasons, independent Claim 1 and its dependent claims are allowable under 35 U.S.C. § 103. For analogous reasons, independent Claims 9 and 21 and their respective dependent claims are allowable under 35 U.S.C. § 103. Accordingly, Applicants respectfully request reconsideration and allowance of all pending claims.

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## **CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6494.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P. Attorneys for Applicants

Keiko Ichiye Reg. No. 45,460

## **Correspondence Address:**

Baker Botts L.L.P. 2001 Ross Avenue, Suite 600 Dallas, Texas 75201-2980 (214) 953-6494

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Customer Number: 05073